Case 1:20-cv-00613-SB Document 418 Filed 03/30/23 Page 1 of 1 PageID #: 97121 Morris, Nichols, Arsht & Tunnell Llp

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March 30, 2023

The Honorable Stephanos Bibas United States District Court for the District of Delaware 844 North King Street Wilmington, DE 19801-3570 VIA ELECTRONIC FILING

Re: Thomson Reuters Enterprise Centre GmbH, et al. v. ROSS Intelligence Inc.,

C.A. No. 20-613 (SB) (D. Del.)

Dear Judge Bibas,

As requested at the discovery conference on Tuesday, I write to provide a brief update on Thomson Reuters' efforts to investigate the way in which the source code for Westlaw works. Based on discussions with Thomson Reuters' employees over the last two days, Thomson Reuters will be able to discuss a potential stipulation with ROSS, and the parties will meet and confer tomorrow, Friday, March 31.

If the parties are unable to reach an agreement on a proposed stipulation, the parties will either propose competing stipulations by April 5 or Thomson Reuters will make its source code available for review, consistent with how ROSS's source code was produced and reviewed in the copyright case, and subject to the Protective Order entered in this case.

Respectfully,

Michael Flynn (# 5333)

MJF/rah

cc: All Counsel of Record (via electronic mail)